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October 6, 2022

**BY ECF**

Hon. Jesse M. Furman  
United States District Judge  
U.S. District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10017

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 44. SO ORDERED.



October 6, 2022

Re: *Schulte v. United States v. Cordero, et al.*, 21-CV-4042 (JMF)

Dear Judge Furman:

We respectfully request that the deadline to file plaintiff's opposition to the motion to dismiss be extended from October 14 to November 18, with the Government's reply deadline being extended from October 21 to December 9. The Government consents to this request. This is our second extension request. The first deadline for opposition was September 9, 2022. The Court granted our request to extend the deadline to October 14 so that we could meet with Mr. Schulte and familiarize ourselves with the consolidated cases' underlying facts and law (Docket No. 41).

On August 24, 2022, I filed a Notice of Appearance on behalf of Joshua Adam Schulte for the limited purpose of assisting him with opposing the Government's motion to dismiss this action and those consolidated under this action pursuant to the Court's Order of January 12, 2022 (Docket No. 18). We have yet to speak with Mr. Schulte, due to the Special Administrative Measures (SAMs) not permitting his civil counsel to communicate with or visit him. The SAMs were not modified to allow communication with civil counsel until September 21. My team and I carefully reviewed the updated SAMs and returned our affirmations of compliance to the Government on September 28. We are awaiting MDC approval of our access.

We believe additional time is necessary in order to speak to our client about the underlying facts in his twelve complaints—which allege conduct occurring over four years—counsel him regarding the opposition motion, and complete that opposition in keeping with those conversations.

Thank you for your consideration.

Respectfully submitted,

/s/

Michael W. Martin, Esq.  
Lincoln Square Legal Services, Inc.  
Attorney for Mr. Schulte

cc: Tara Schwartz  
Assistant United States Attorney  
**BY EMAIL AND ECF**